

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

TINA JOHNSON
Plaintiff

vs.

**DAVID THOMAS HERBERT AND
INTRACOASTAL LIQUID MUD, INC.**
Defendants

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CIVIL ACTION NO. 1:22-cv-00411

AMAZON'S DEPOSITION PAGE LINE DESIGNATIONS

Defendant Amazon Logistics, Inc. ("Amazon") designates the following deposition testimony. Defendant reserves the right to supplement, amend, add additional witnesses, and/or de-designate portions of these designations in response to Plaintiff's and Kendrick's designations.

DEPOSITION OF TODD GOODHEART

Taken on April 6, 2023

PAGE	LINE	PAGE	LINE
6	23	6	24
8	3	8	8
8	14	8	15
9	2	9	7
9	17	10	4
11	1	11	13
13	3	13	18
18	19	18	23
19	10	19	21
26	12	26	23
28	3	28	18
29	16	29	21
31	9	32	2
41	11	41	13
50	19	50	23
53	5	53	15
59	6	59	17
59	23	60	3

61	23	62	22
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DEPOSITION OF DAVID HERBERT

Taken on February 1, 2022

PAGE	LINE	PAGE	LINE
6	10	6	12
14	10	14	17
15	24	16	17
16	23	17	2
19	5	19	15
20	19	20	20
20	21 (beginning a “back”)	20	24
21	8 (beginning at “it sounds”	21	11
26	14	26	19
27	1	27	8 (ending at “no.”
27	13 (beginning at “I’m”)	27	23
28	8	28	11
28	12 (beginning at second “This”)	29	8
29	11 (beginning at “You”)	29	17
30	18 (beginning at “The”)	31	5
32	14 (beginning at “you”	32	19
32	23	32	25
33	14	33	17
34	20	37	10
38	1 (beginning at “One”)	39	17
59	10	59	15
62	18	63	20
64	1	64	7
64	10 (beginning at “But”)	64	12
65	5 (beginning at “We”)	66	4
66	8	66	10
66	11 (beginning at “During”)	66	16
67	5	67	16
68	15	68	22

68	24 (beginning at “And”)	69	4
69	15 (beginning at “Where”)	69	16
69	18 (beginning at “Before”)	69	22
69	23 (beginning at “And”)	70	22
71	3	72	20
73	14 (beginning at “But”)	73	19
73	22	73	22
73	25 (beginning at “But”)	74	6
74	9	74	13
74	16 (beginning at “So”)	74	22
75	6 (beginning at “Now”)	76	15
76	20	77	15
78	3 (beginning at “But”)	78	24
79	5	79	9
79	20 (beginning at “You”)	80	6
81	18	81	25
82	10 (beginning at “In”)	82	15
82	20	83	1
84	9	85	11
86	7	86	13
86	17	86	22
87	1	87	4
87	18	87	23
91	24	92	5
93	13	93	19
94	25	95	7
95	16	96	15
96	16 (beginning at “I’m”)	96	18 (ending at “Exhibit 5.”)
99	14 (beginning at “Let’s”)	99	24
100	2	100	3
100	8	100	11
100	17 (beginning at “And”)	100	4
102	12	102	16

103	20	103	10
103	17	103	21
105	15 (beginning at “I’m”)	105	17
107	23	108	10
109	3	109	9
109	11	110	2
110	5	110	5
110	12	111	7
111	15	111	20
116	17	116	25
117	11 (beginning at “Mr.”)	117	13
117	16	118	13
119	20	119	20
120	7 (beginning at second “I”)	120	16

DEPOSITION OF DAVID HERBERT

Taken on September 6, 2023

PAGE	LINE	PAGE	LINE
5	9	5	10
6	19	6	21
8	11	8	18
8	23	9	7
9	13	10	2
10	8	10	10
10	21	10	24
11	10	11	12
12	17	12	19
13	9	13	18
16	2	16	9
24	1 (beginning at “Based”)	24	12
26	20	27	5
27	13	27	23
28	2	28	5
28	9	29	8
29	13	29	20
31	22	33	7
33	22	34	24
35	5	35	8
39	15	40	3
43	8 (beginning at “Sir”)	44	9

44	11	44	15
46	22	47	1

DEPOSITION OF BRIAN KENDRICK

Taken on June 13, 2023

PAGE	LINE	PAGE	LINE
7	3	7	5
8	9	8	14
8	17	8	24
9	6	9	11
9	25	10	2
11	14	11	16
13	4	13	20
15	6	15	12
15	22	16	4
16	12	16	23
17	9	17	12
17	16	17	21
19	7	19	13
20	24	21	18
23	12	24	2
24	15	25	2
26	1	26	9
28	7	28	16
29	5	29	13
33	10	33	15
33	21	34	5
34	16	35	2
35	5	36	3
39	22	40	1
47	24	48	3
59	1	59	5
59	20	60	13
60	24	61	8
61	10 (beginning at "The")	61	21
62	5	62	10
62	15	62	18
62	21	67	22
67	25 (beginning at "Among")	69	2
69	23	70	11
70	21	71	1
71	21	73	16

75	5	76	25
77	6	78	9
93	4	94	19
104	19	105	11
105	19	105	21

DEPOSITION OF TODD LOUIS MALLET

Taken on February 1, 2022

PAGE	LINE	PAGE	LINE
6	18	6	20
8	10 (beginning at “Who’s”)	8	20
9	20	10	5
25	24 (beginning at “There”)	26	4
26	9	26	12
27	1 (beginning at “So”)	27	8
27	11	28	3
28	24	29	3
29	6	29	12
29	25	30	5
31	21	31	22
35	22	36	13
37	5	38	2
41	18	41	20
47	10	47	19
48	3	48	14
48	23	49	4
49	9	49	22
50	13	50	24

DEPOSITION OF RYAN SANDEFUR

Taken on August 9, 2023

PAGE	LINE	PAGE	LINE
10	20	10	21
11	2	11	4
12	13	14	5
15	2	15	18
20	2	20	18
21	14	21	20
23	2	23	9
23	24	24	17
28	22	29	12

29	25	30	1
30	10	30	12
30	15	30	15
30	17	30	18
30	20	30	22
32	12	32	15
32	17	32	17
32	19	32	22
32	24	32	24
33	2	33	6
33	8	33	8
33	10	33	14
33	16	33	18
34	7	34	12
34	15	34	17
35	21	35	23
36	10	36	15
37	3	37	15
37	19	37	25
39	21	40	1
40	23 (beginning at “I’m”)	41	6
42	10	42	22
43	6	43	8
43	10	43	11
43	13	43	16
43	20	43	22
43	24	44	6
46	8	46	13
46	19	46	22
47	4	47	20
48	12	48	16
48	18	48	24
49	4	49	12
50	20	51	10
51	12	51	12
51	14	52	9
52	11	52	11
54	4	54	8
54	14	54	19
55	18	55	25
56	9	56	11*
56	13	56	17*
56	19	56	19*
56	21	56	25

57	2	57	2
60	5	61	16
62	8	62	16
63	10	63	19
64	16	65	18
67	4	67	7
68	24	69	1
69	3	69	3
69	5	69	9
69	12	69	21
69	23	69	24
70	6	70	9
70	11	70	11
70	13	71	17
71	19	71	19
71	21	72	9
72	11	72	11
72	13	72	15
72	17	72	17
73	5	73	10
73	12	73	12
73	14	73	17
73	19	73	19
73	21	73	24
74	1	74	1
74	3	74	5
74	7	74	7
76	22	77	14
88	23	89	5
89	20	89	25
94	23	95	6
95	12	95	18
96	9	96	18
102	11	102	24
104	19	105	8
107	4	107	13
107	19	107	23
109	6 (beginning at "What")	109	25
110	2	110	4
110	8	110	13
110	24	111	2
115	2	115	16
116	16	116	20
116	22	116	25

120	17	121	5
122	20 (beginning at “If”)	122	25
124	20	124	24
125	2	125	2
125	4	125	7
125	10	125	13
132	7 (beginning at “Does”)	134	23
139	11	140	6
148	3	148	12
148	15	148	19
148	21	149	8
149	12	149	13
149	15	149	17
149	19	149	23
149	25	149	25
150	2	150	5
150	7	150	14*
150	16	151	3
151	5	151	5
151	7	151	19
151	21	151	21
151	23	152	4
152	6	152	13
152	15	152	16
152	18	152	23
152	25	152	25
153	2	153	6
153	8	153	8
153	10	153	12
153	14	153	15
155	9	155	10
155	12	155	24
156	2	156	14
158	9	158	16
160	3	160	12
161	22	163	10
165	23 (beginning at “On”)	166	2
166	4	166	4
166	6	166	9
166	11	166	11
166	13	167	16
168	6	168	12
169	25	170	9

170	11	170	11
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*Testimony subject to correction in errata sheet.

CROSS-DESIGNATION OF DEPOSITION TESTIMONY:

Defendant Amazon Logistics, Inc. reserves the right to introduce any deposition testimony designated by Plaintiff or Co-Defendants. By doing so, Amazon does not waive their objections to such testimony. Amazon further reserves the right to counter-designate additional portions of testimony in response to Plaintiff's and Defendant Kendrick's designations.

Respectfully submitted,

**WILSON ELSEER MOSKOWITZ
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/s/ John Bridger
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**ATTORNEY FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to counsel of record in accordance with the Federal Rules of Civil Procedure, on this the 5th day of October, 2023.

/s/ John Bridger
JOHN BRIDGER